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Las Vegas, LLC; The One Group,
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHLOE C., pseudonymously,

Plaintiff,

v.

Case No. 2:23-cv-02056-GMN-BNW

JAMAL F. RASHID a/k/a “MALLY
MALL”; HIGHATE HOTELS, L.P.;
RADISSON HOSPITALITY, INC.;
WYNN LAS VEGAS, LLC; MGM
RESORTS INTERNATIONAL; ARIA
RESORT & CASINO LLC; NEVADA
PROPERTY 1, LLC; DEUTSCHE
BANK AG; DEUTSCHE IMOBILIEN
AG; DESERT PALACE, LLC; STK
LAS VEGAS, LLC; THE ONE
GROUP, LLC; THE ONE GROUP
HOSPITALITY, INC.; and THE
LIGHT GROUP, LLC,

**STIPULATION AND ORDER TO
STAY DISCOVERY**

Defendants.

Plaintiff Chloe C. and Defendants Wynn Las Vegas, LLC; The Light Group, LLC;
Highgate Hotels, L.P.; STK Las Vegas, LLC; The One Group, LLC; The One Group Hospitality,
Inc.; MGM Resorts International; Aria Resort & Casino LLC; and Nevada Property 1, LLC
(collectively the “Parties”), by and through their respective counsel of record, hereby agree and
stipulate as follows:

On March 1, 2024, Defendants filed their respective motions to dismiss Plaintiff's first amended complaint. (ECF Nos. 69, 71, 70, 72, 73, 77) (the "Motions to Dismiss").

On April 5, 2024, Plaintiff filed her omnibus opposition to the Motions to Dismiss. (ECF No. 88).

In the interests of judicial economy and to avoid the incurrence of unnecessary attorneys' fees and costs, the Parties agree that discovery should be stayed pending the Court's ruling on the aforementioned Motions to Dismiss. Good cause exists for a stay of discovery here because discovery in this case involves the production of records involving a Plaintiff who alleges she is a survivor of human trafficking. Discovery will necessarily involve highly sensitive documents related to Plaintiff; a stay while Defendants' Motions to Dismiss are pending will maximize the protections of Plaintiff's privacy, conserve judicial resources, and avoid unnecessary costs.

To the extent that the Court's decision on the Motions to Dismiss does not fully dispose of this matter, the Parties agree that a discovery plan and proposed scheduling order shall be due within thirty (30) days of the Court's decision on the Motions to Dismiss.

The Parties further discussed and intend to propose a one (1) year discovery period commencing as of the date of the Court's ruling on the Motions to Dismiss.

IT IS SO STIPULATED.

Dated: April 29, 2024

NAYLOR & BRASTER

HILTON PARKER LLC

By: /s/ Jennifer L. Braster

By: /s/ Geoffrey Parker

Jennifer L. Braster

Geoffrey Parker, Esq. (*Pro Hac Vice*)

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DIAL, LLC

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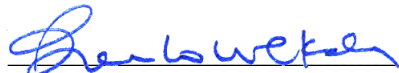
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*Attorneys for Defendant Aria Resort & Casino
Holdings LLC, MGM Resorts International,
and Nevada Property 1, LLC*

IT IS SO ORDERED. All discovery shall be stayed pending the Court's decision on the Motions to Dismiss. To the extent the Court's decision on the Motions to Dismiss does not fully dispose of this matter, a discovery plan and proposed scheduling order shall be due within thirty (30) days of the Court's decision.



UNITED STATES MAGISTRATE JUDGE

Dated: April 30, 2024

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 4(b), I hereby certify that I am an employee of NAYLOR & BRASTER and that on this 29th day of April, 2024, I caused the document **STIPULATION AND ORDER TO STAY DISCOVERY** to be served through the Court's CM/ECF system to those persons designated by the parties that have appeared in the matter.

/s/ Amy Reams

An Employee of NAYLOR & BRASTER